

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST  
LITIGATION

Civil No. 18-1776 (JRT/HB)

**JOINT UPDATE LETTER**

This Document Relates To:

All Actions

Dear Judge Bowbeer:

Pursuant to the proposed order submitted at ECF No. 615, Direct Purchaser Plaintiffs and Commercial and Institutional Indirect Purchaser Plaintiffs (collectively, “Plaintiffs”) and Defendants hereby provide the following joint update regarding the status of their ongoing negotiations regarding document search methodology and search terms. The Parties have met and conferred regarding the search terms that will be used by Plaintiffs on their ESI. The Parties have made significant progress, and are optimistic that they will be able to resolve the remaining disputes without Court intervention. However, the parties require additional time to complete those discussions.

Plaintiffs and Defendants will work diligently to complete the meet-and-confer process relating to the Plaintiffs’ document search methodology and search terms by February 5, 2021. The Parties shall submit a joint status letter by February 5, 2021 regarding any disputes on document search methodology and search terms that still remain at that point.

Dated: January 22, 2021

/s/ Bobby Pouya

Bobby Pouya (Pro Hac Vice)  
Clifford H. Pearson (Pro Hac Vice)  
Daniel L. Warshaw (Pro Hac Vice)  
Michael H. Pearson (Pro Hac Vice)  
PEARSON SIMON & WARSHAW, LLP  
15165 Ventura Boulevard, Suite 400  
Sherman Oaks, CA 92403  
Telephone: (818) 788-8300  
Facsimile: (818) 788-8104  
cperson@pswlaw.com  
dwarshaw@pswlaw.com  
bpouya@pswlaw.com  
mperson@pswlaw.com

Melissa S. Weiner (MN #0387900)  
Joseph C. Bourne (MN #0389922)  
PEARSON, SIMON & WARSHAW, LLP  
800 LaSalle Avenue, Suite 2150  
Minneapolis, MN 55402  
Telephone: (612) 389-0600  
Facsimile: (612) 389-0610  
mweiner@pswlaw.com  
jbourne@pswlaw.com

Bruce L. Simon (Pro Hac Vice)  
PEARSON, SIMON & WARSHAW, LLP  
350 Sansome Street, Suite 680  
San Francisco, CA 94104  
Telephone: (415) 433-9000  
Facsimile: (415) 433-9008  
bsimon@pswlaw.com

/s/ Arielle S. Wagner

Arielle S. Wagner (MN #0398332)  
W. Joseph Bruckner (MN #0147758)  
Brian D. Clark (MN #0390069)  
Craig S. Davis (MN #0148192)  
Simeon A. Morbey (MN #0391338)  
Stephen M. Owen (MN # 0399370)  
Stephanie A. Chen (MN #0400032)  
LOCKRIDGE GRINDAL NAUEN P.L.L.P.  
100 Washington Avenue South, Suite 2200  
Minneapolis, MN 55401  
Telephone: (612) 339-6900  
Facsimile: (612) 339-0981  
aswagner@locklaw.com  
wjbruckner@locklaw.com  
csdavis@locklaw.com  
bdclark@locklaw.com  
samorbey@locklaw.com  
smowen@locklaw.com  
sachen@locklaw.com

***Co-Lead Class Counsel for Direct Purchaser Plaintiffs***

/s/ Shawn M. Raiter

Shawn M. Raiter (MN# 240424)

LARSON • KING, LLP

2800 Wells Fargo Place

30 East Seventh Street

St. Paul, MN 55101

Telephone: (651) 312-6518

sraiter@larsonking.com

Jonathan W. Cuneo

Joel Davidow

Blaine Finley

Yifei “Evelyn” Li

CUNEO GILBERT & LADUCA, LLP

4725 Wisconsin Avenue NW, Suite 200

Washington, DC 20016

Telephone: (202) 789-3960

jonc@cuneolaw.com

joel@cuneolaw.com

bfinley@cuneolaw.com

evelyn@cuneolaw.com

***Co-Lead Counsel for Commercial and  
Institutional Indirect Purchaser Plaintiffs***

/s/ Mark L. Johnson

Mark L. Johnson (#0345520)  
Virginia R. McCalmont (#0399496)  
GREENE ESPEL PLLP  
222 South Ninth Street, Suite 2200  
Minneapolis, MN 55402  
(612) 373-0830  
mjohnson@greeneespel.com  
vmccalmont@greeneespel.com

Daniel Laytin, P.C. (*pro hac vice*)  
Christa Cottrell, P.C. (*pro hac vice*)  
Christina Briesacher (*pro hac vice*)  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
(312) 861-2000  
daniel.laytin@kirkland.com  
christa.cottrell@kirkland.com  
christina.briesacher@kirkland.com

***Counsel for Clemens Food Group, LLC  
and The Clemens Family Corporation***

/s/ Richard A. Duncan

Richard A. Duncan (#0192983)  
Aaron D. Van Oort (#0315539)  
Craig S. Coleman (#0325491)  
Emily E. Chow (#0388239)  
Isaac B. Hall (#0395398)  
Bryan K. Washburn (#0397733)  
FAEGRE DRINKER BIDDLE &  
REATH LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402-3901  
(612) 766-7000  
richard.duncan@faegredrinker.com  
aaron.vanoort@faegredrinker.com  
craig.coleman@faegredrinker.com  
emily.chow@faegredrinker.com  
isaac.hall@faegredrinker.com  
bryan.washburn@faegredrinker.com

***Counsel for Hormel Foods Corporation  
and Hormel Foods, LLC***

/s/ David P. Graham

David P. Graham  
DYKEMA GOSSETT PLLC  
90 S 7th Street, FL 2  
Minneapolis, MN 55402  
Telephone: 612-486-1521  
dgraham@dykema.com

Rachel Adcox (*pro hac vice*)  
Tiffany Rider (*pro hac vice*)  
AXINN, VELTROP & HARKRIDER  
LLP  
950 F. Street, NW  
Washington, DC 20004  
Telephone: 202.912.4700  
radcox@axinn.com  
trider@axinn.com

Jarod Taylor (*pro hac vice pending*)  
AXINN, VELTROP & HARKRIDER  
LLP  
90 State House Square  
Hartford, CT 06103  
Telephone: 860.275.8109  
jtaylor@axinn.com

***Counsel for Tyson Foods, Inc.,  
Tyson Fresh Meats, Inc., and Tyson  
Prepared  
Foods, Inc.***

/s/ William L. Greene

William L. Greene (#0198730)  
Peter J. Schwingler (#0388909)  
Jon M. Woodruff (#0399453)  
STINSON LLP  
50 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
(612) 335-1500  
william.greene@stinson.com  
peter.schwingler@stinson.com  
john.woodruff@stinson.com

J. Nicci Warr (*pro hac vice*)  
STINSON LLP  
7700 Forsyth Blvd., Suite 1100  
St. Louis, MO 63105  
(314) 863-0800  
nicci.warr@stinson.com

***Counsel for Seaboard Foods LLC***

/s/ John A. Cotter

John A. Cotter (#0134296)

John A. Kvinge (#0392303)

LARKIN HOFFMAN DALY &  
LINDGREN LTD.

8300 Norman Center Drive, Suite 1000

Minneapolis, MN 55427-1060

(952) 835-3800

jcotter@larkinhoffman.com

jkvinge@larkinhoffman.com

Richard Parker (*pro hac vice*)

Josh Lipton (*pro hac vice*)

GIBSON, DUNN & CRUTCHER, LLP

1050 Connecticut Avenue, N.W.

Washington, D.C. 20036-5306

(202) 955-8500

rparker@gibsondunn.com

jlipton@gibsondunn.com

Brian Robison (*pro hac vice*)

GIBSON, DUNN & CRUTCHER, LLP

2001 Ross Avenue, Suite 2100

Dallas, TX 75201-6912

(214) 698-3370

brobison@gibsondunn.com

***Counsel for Smithfield Foods, Inc.***